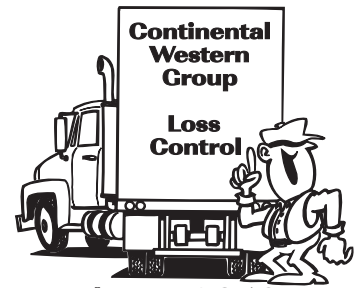


# TRUCK TALK

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## Safety Management Cycle - the DOT MANDATED REPAIR

"We don't have anything broken, so why should we think about repairs?"

This can be the response of many carriers – some of whom are experiencing SMS (Safety Management System) scores that exceed the allowable threshold for the individual BASIC areas. There are similarities within this system for all BASICS, so the focus of this Truck Talk will be applicable to all areas – but specific FMCSA recommendations by BASIC can be downloaded from the web site by clicking on "Safety Management Cycles" as highlighted below from the following web page:

[http://csa.fmcsa.dot.gov/About/SMC\\_Overview.aspx](http://csa.fmcsa.dot.gov/About/SMC_Overview.aspx)

- About CSA: What Is It?
- Why Is CSA Needed?
- What are Eval Results?
- How Does CSA Work?
  - Measurement
  - Evaluation
  - Intervention
  - Safety Management Cycles**
- What are SMS Changes?
- What Is Your Role?

### What Is the Safety Management Cycle?

The Safety Management Cycle (SMC) is the signature tool behind the Federal Motor Carrier Safety Administration's (FMCSA) investigative process. FMCSA designed the SMC to help Safety Investigators (SIs) and motor carriers improve safety by identifying and correcting safety performance and compliance issues.

#### How Is the Safety Management Cycle Used

The SMC provides SIs and motor carriers with a step-by-step process that goes beyond just identifying "what" the violation is to get at "why" the safety performance issue is occurring. The tool is made up of the following six Safety Management Processes (SMPs), which are laid out in a specific order to represent the areas of a motor carrier's operations: Policies and Procedures, Roles and Responsibilities, Qualification and Hiring, Training and Communication, Monitoring and Tracking, and Meaningful Action.

Taken together, the SMPs help to provide a framework for SIs and motor carriers to identify and correct breakdowns or safety compliance issues before or after they have occurred. This framework can be applied to all of the seven Behavior Analysis and Safety Improvement Categories (BASICS): Unsafe Driving, Hours-of-Service Compliance, Driver Fitness, Controlled Substances/Alcohol, Vehicle Maintenance, Hazardous Materials Compliance, and Crash Indicator.



Choose the applicable Safety Management Cycle designed for compliance with your specific BASIC – in this case, Vehicle Maintenance, Inspection & Repair:

- Develop a system of preventive maintenance for compliant, safe, and efficient fleet operations, including a schedule for periodic maintenance, inspection, and recordkeeping. This system should be attuned to manufacturer recommendations, the carrier's own experience, and regulatory requirements.
- Develop a procedure ensuring that vehicle defects that impact safety and/or safety compliance are reported, repaired, and certified before the vehicle is operated.
- Develop procedures to ensure that management is notified of vehicle defects through the use of Driver Vehicle Inspection Records (DVIRs) and other communication channels, such as driver call-in and e-mail from mechanics.
- Develop a policy ensuring that drivers are required to complete thorough and timely DVIRs by the end of the day on a trip and prior to a subsequent assignment.
- Establish a policy requiring that drivers submit copies of all roadside inspections to carrier management within 24 hours.
- Develop policies and procedures requiring that drivers immediately notify appropriate management of any roadside vehicle Out-of-Service Order (OOSO).
- Develop a written and progressive disciplinary policy focused on taking corrective action to ensure drivers comply with regulations and policies. A progressive disciplinary policy could include, among other things, written warnings, suspensions, work restrictions, monetary penalties, and termination. This policy should also specify consequences for any carrier official who knowingly and willfully allows vehicle maintenance violations.

The common ingredient for compliance with any Safety Management Cycle issue, and the most important among the entire group, is to DOCUMENT all elements of the cycle. Dealings with FMCSA/DOT (and most likely any regulatory body) must be documented and records maintained as you would any of the records covered by the appropriate BASIC.

Another common ingredient among the SMC areas for all BASICS is an established written disciplinary policy which could include written warnings, suspensions, work restrictions, monetary penalties and/or termination. The disciplinary process must be applied uniformly to all drivers, must be done in writing, and it would be appropriate to have the driver either sign a copy or, if mailed, sent certified mail.

The Safety Management Cycle has been initiated as a remedial process, but if implemented voluntarily, can provide a high level of documented compliance and will demonstrate due diligence should any type of intervention occur. It's a good system to implement before being told to do so by FMCSA/DOT!

**[Ispain@cwgins.com](mailto:Ispain@cwgins.com) • [jschenker@cwgins.com](mailto:jschenker@cwgins.com) • [ckovachevich@cwgins.com](mailto:ckovachevich@cwgins.com)**

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